

Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,
Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO
TRUCKING LLC,
Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY
VIDEO DEPOSITION OF TRAVIS KALANICK
San Francisco, California
Thursday, December 14, 2017
Volume III

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546
JOB NO. 2771242

PAGES 504 - 668

Page 504

1 generally, was -- you know, we had a -- you know, a 12:45:18
2 former AUSA, a former prosecutor in Joe Sullivan
3 sort of overseeing -- you know, there are a lot of
4 groups in his -- you know, in his domain, but that
5 was one of them, and felt pretty confident that, 12:45:31
6 you know, he sort of knew how to manage that kind
7 of -- that kind of effort.

8 Q. Okay. At some point in time, you did --
9 became aware of allegations that Ric Jacobs, now
10 former Uber employee, made; is that -- is that 12:45:53
11 right?

12 A. Yeah. There was an email that was --
13 that, I think, he sent when he resigned, and I
14 would -- I -- I received that email.

15 Q. Okay. What -- how did you react to that 12:46:02
16 email when you saw it?

17 A. Well, look, I mean, it was a -- it was a
18 serious email. So I took it seriously and
19 forwarded it to Joe Sullivan, who runs security. I
20 was obviously concerned; like, hey, is any of this 12:46:21
21 true?

22 Q. Is that something that you asked him, or
23 it's just you're -- that's just the reaction, which
24 is what I --

25 A. Well, that's certainly -- 12:46:31

1 Q. (By Mr. Perlson) Okay. But counsel for 12:49:42
2 Uber was present at the interview?
3 A. I don't remember.
4 Q. Okay.
5 A. I don't remember anybody -- sorry. I 12:49:48
6 don't remember any Uber internal counsel being
7 there. There was Uber external counsel.
8 Q. Right.
9 A. Yeah.
10 Q. Wilmer was the firm that Uber had 12:49:58
11 retained, right?
12 A. Correct. Yeah.
13 Q. Af- -- subsequent to your email -- I'm
14 sorry, not your email. Sorry.
15 A. Yeah. 12:50:11
16 Q. Subsequent to the email that Mr. Jacobs
17 sent you in April, there was a -- he sent a demand
18 letter to -- to Uber. Do you -- did -- in May.
19 Did you see -- receive that?
20 A. I did not. 12:50:19
21 Q. Okay. And have you ever seen that?
22 A. No.
23 Q. Have you ever discussed the -- the
24 contents of -- of that letter?
25 A. At a very high level in prep for this 12:50:28

1 deposition. 12:50:31

2 Q. Okay. Had -- prior to your preparation
3 for this deposition, had anyone ever told you what
4 the contents of the allegation of the -- the May
5 demand letter were? 12:50:46

6 A. No.

7 Q. Did you know that it existed before your
8 prep for your deposition?

9 A. At -- at --

10 MS. DUNN: Objection to form. 12:50:56

11 THE DEPONENT: -- at some point I knew
12 that some kind of letter existed, but I didn't know
13 what it was.

14 Q. (By Mr. Perlson) Did you ever ask to see
15 it? 12:51:04

16 A. I don't remember if I asked to see it. I
17 know I never got to saw -- see it, and it may have
18 been because there was an independent
19 investigation. I -- I don't remember specifically
20 asking for it. 12:51:16

21 Q. Did you ever ask for the results of the
22 investigation into the allegations made by
23 Mr. Jacobs?

24 A. Yes.

25 Q. When was that? 12:51:30

Page 527

1 I, Rebecca L. Romano, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

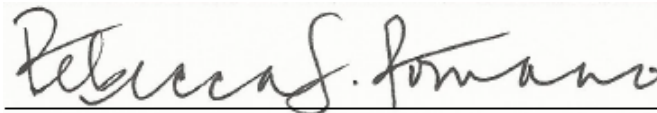
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath;
8 that a record of the proceedings was made by me
9 using machine shorthand which was thereafter
10 transcribed under my direction; that the foregoing
11 transcript is true record of the testimony given.

12 Further, that if the foregoing pertains to the
13 original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [x] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21 Dated: December 15, 2017

22
23 
24

25 Rebecca L. Romano, RPR,
CSR. No 12546